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Attorney for Material Witnesses

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, vs. Matthew Charles Kennedy, et. al. Defendants.	Criminal Case No.: 08CR0650J Magistrate Case No.: 08MJ0569 **MOTION FOR MATERIAL WITNESS'S VIDEOTAPED DEPOSITION** **DATE: March 25, 2008** **TIME: .9:30 am** **HON.: NITA L. STORMES**

TO UNITED STATES ATTORNEY KAREN P. HEWITT OR HER REPRESENTATIVE, TO ATTORNEYS, JOHN C. ELLIS, JR.OF FEDERAL DEFENDERS FOR DEFENDANT LAWRENCE DOSS, JOAN KERRY BADER FOR DEFENDANT MATTHEW CHARLES KENNEDY AND SHAUN KHOJAYAN FOR DEFENDANT SANDRA BNI:

NOTICE IS HEREBY GIVEN that on March 25, 2008 at 9:30 am, or as soon thereafter as the matter may be heard, in the courtroom of Honorable Stormes of this court, located at 940 Front Street, San Diego, California, 92101, Material Witnesses, by and through their attorney of record, Linda A. King, will move the court for an order authorizing the videotaped depositions of the material witnesses.

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The motion will be made on the ground that there is good cause for the order requested in that the material witnesses know of no sureties in this country who will bond them out of US Marshal's Custody during the pendency of this matter. Neither the interests of justice nor the convenience of the parties and witnesses will be served by requiring the material witnesses to remain in Marshal's Custody until the matter is concluded.

Date: 3/13/08

Linda A. King
Linda A. King
Attorney for Material Witnesses